

JAP:ACG

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

COMPLAINT

- against -

(21 U.S.C. § 963)

SULAIKA DEJESUS MENDEZ,

Defendant.

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

PAUL NUGENT, being duly sworn, deposes and states that he is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations ("HSI"), duly appointed according to law and acting as such.

On or about July 16, 2015, within the Eastern District of New York and elsewhere, the defendant SULAIKA DEJESUS MENDEZ, together with others, did knowingly and intentionally conspire to import a controlled substance into the United States from a place outside thereof, which offense involved a substance containing methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 952(a).

(Title 21, United States Code, Section 963)

The source of your deponent's information and the grounds for his belief are as follows:¹

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

1. On or about July 13, 2015, one clear plastic bag containing two bags of plastic-wrapped items, including piñata candy, arrived at the NYACC Cargo Facility at John F. Kennedy International Airport in Queens, New York (the "Subject Package"). An airway bill for the Subject Package listed the shipper's name and address as "Luna Envios, S.A. DE C.V., Reforma No. 109 Secc. 2 Centro, Tulcingo Del Valle, Puebla, Pue., Mexico." That airway bill also listed the recipient's address as "J. Luna International Bisnes, Inc. 85-16 Roosevelt 1o [sic] Piso, Jackson, New York, U.S.A. 11372" (the "Delivery Location"). A separate manifest pertaining to the Subject Package listed the recipient's name as "Osbaldo Rivera" and the recipient's contact phone number as "(336)-755-4249."

2. On or about July 13, 2015, United States Customs and Border Protection ("CBP") officers opened and inspected the contents of the Subject Package. Within the Subject Package, the CBP officers located, among plastic-wrapped candies, a white and orange powdery substance contained in numerous individually wrapped plastic packets. A field test for methamphetamine, a Schedule II controlled substance, was administered to the white and orange powdery substance and produced a positive result. In total, the substance recovered from the Subject Package weighed approximately 4.24 kilograms.

3. On or about July 16, 2015, HSI Special Agents conducted surveillance of the Delivery Location, which appeared to be a travel agency located at 86-15 Roosevelt Avenue, Jackson Heights, New York 11372. The building has a glass front window, and the front door to the building faces Roosevelt Avenue. The front door is made of glass with a metal frame. The number 86-15 appears on the awning above the front window.

4. On or about July 16, 2014, law enforcement agents conducted a controlled delivery of the Subject Package at the Delivery Location. An agent went into the

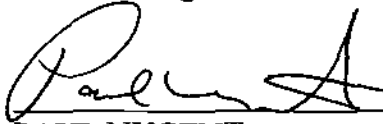
Delivery Location and posed as an employee. An employee of the travel agency made and received several calls with the named recipient, who stated that he was not available to pick up the package. The named recipient informed the employee that the defendant was authorized to pick up the package and gave the employee the defendant's name and phone number.

5. The employee of the travel agency contacted the defendant, who stated, in sum and substance, that she was aware of the package and was going to pick up the package.

6. At approximately 7:15 p.m., the defendant arrived at the Delivery Location to pick up the package. The defendant entered the Delivery Location, signed for the package, and exited the Delivery Location with the package. After the defendant exited the Delivery Location, she was placed under arrest.

7. The defendant was advised of her Miranda rights verbally and in writing. The defendant read and signed a Miranda waiver form and also verbally waived her Miranda rights. The defendant stated, in sum and substance and in part, that she knew the Subject Package contained narcotics and that she was to be paid \$1,000 to pick up the Subject Package.

WHEREFORE, your deponent respectfully requests that the defendant SULAIIKA DEJESUS MENDEZ be dealt with according to law.



PAUL NUGENT
Special Agent
United States Department of Homeland Security,
Homeland Security Investigations

Sworn to before me this
17th day of July, 2015

S/ Ramon Reyes, Jr.

THE HONORABLE RAMON E. REYES, JR.
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK